

**STATEMENT OF BASIS (AI No. 43599)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0104159 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Sunbelt Chemicals Corp.  
71 Hargrove Grade  
Palm Coast, FL 32137

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Ronda Burtch

**DATE PREPARED:** July 22, 2009

**1. PERMIT STATUS****A. Reason for Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

**B. NPDES permit –** NPDES permit effective date: N/A  
NPDES permit expiration date: N/A

**C. LPDES permit –** LA0104159  
LPDES permit effective date: February 1, 2004  
LPDES permit expiration date: January 31, 2009

LPDES permit LA0104159 was modified on November 14, 2008 to reflect the name change from Trans Chem, Inc. to Sunbelt Chemicals Corp.

**D. Date Application Received:** January 13, 2009

**2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY - chemical repackager and wholesale distributor**

Sunbelt Chemicals Corporation is a chemical repackager and wholesale distributor. This facility repackages hydrochloric acid used in the treatment of swimming pools and in the construction industry for cleaning brick and concrete. The acid is purchased at a high strength and is blended with water to obtain the final strength. The product is packaged in quart, 1 gallon, 15 gallon, and 55 gallon containers.

**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: III
4. SIC code: 5169

**C. LOCATION -** 1259 Safe Energy Drive in Port Allen, West Baton Rouge Parish  
Latitude 30° 29' 50", Longitude 91° 13' 07"

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### 3. OUTFALL INFORMATION

#### Outfall 001

Discharge Type: treated sanitary wastewater

Treatment: extended aeration sewage treatment plant

Location: at the point of discharge from the sewage treatment plant, prior to mixing with other waters

Flow: 300 GPD

Discharge Route: unnamed ditch, thence into Three Canal, thence into the Intracoastal Waterway

#### Outfall 002

Discharge Type: stormwater from the hydrochloric acid storage tank containment area

Treatment: caustic soda used to adjust pH

Location: at the point of discharge from the diked storage containment area, prior to mixing with other waters

Flow: intermittent

Discharge Route: unnamed ditch, thence into Three Canal, thence into the Intracoastal Waterway

### 4. RECEIVING WATERS

STREAM - unnamed ditch, thence into Three Canal, thence into the Intracoastal Waterway

BASIN AND SEGMENT - Terrebonne Basin, Segment 120103

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife

### 5. TMDL STATUS

Subsegment 120103, Bayou Choctaw – From Bayou Poydras to Bayou Grosse Tete, is not listed on LDEQ's Final 2006 303(d) List as impaired. However, subsegment 120103 was previously listed as impaired for organic enrichment/low DO, for which the below TMDL has been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving waterbodies based upon additional TMDLs and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to the established TMDL for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDL has been established for subsegment 120103:

***TMDLs for Dissolved Oxygen and Nutrients in Selected Subsegments in the Upper Terrebonne Basin, Louisiana (120110, 120102, 120103, 120105, 120106, 120107, 120109)***

Only two facilities, the Alma Plantation and the Ashland Plantation, required changes in their permit limits as a result of the dissolved oxygen (DO) TMDL. Since this facility does have the potential to contribute to the organic enrichment/low DO impairments of this subsegment, the previous BOD<sub>5</sub> limitation will remain in the permit for Outfall 001.

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## 6. CHANGES FROM PREVIOUS PERMIT

1. The chlorides limitation for Outfall 002 has been removed because this subsegment is not impaired for chlorides and a water quality screen indicated that a chloride limitation was not necessary. (see Appendix A-1 and A-2)
2. The discharge route has been changed from the Intracoastal Waterway to an unnamed ditch, thence into Three Canal, thence into the Intracoastal Waterway.
3. This facility is located and discharges into subsegment 120103. However, the previous permit had this facility discharging into subsegment 120109; therefore, the subsegment number has been updated to reflect the facility's location and discharge route.
4. The reporting requirements for Outfall 001 have changed from weekly average to daily maximum for all parameters. Monthly average effluent limitations of 30 mg/l for BOD and TSS and 200 col/100 ml for Fecal Coliform and monthly average flow reporting have been established at Outfall 001. These changes have been made in accordance with current LDEQ guidance for similar discharges.

## 7. COMPLIANCE HISTORY/COMMENTS

- A. OEC – A review of the files, for the period of July 1, 2007 through June 30, 2009, revealed there are no open or pending enforcement actions or current inspections for this facility.
- B. DMR Review/Excursions - A DMR review for the period of July 1, 2007 through June 30, 2009 for Outfall 001, and April 1, 2007 through March 31, 2009 for Outfall 002, revealed the following excursions:

Date	Outfall Number	Parameter	Reported Value	Permit Limits
July – September 2007	002	Chlorides, Daily Max pH, Daily Max	No DMR on File	Report 6.0-9.0 s.u.
July – December 2008	001	BOD <sub>5</sub> , Weekly Avg TSS, Weekly Avg Fecal Coliform, Weekly Avg pH, Weekly Avg	No DMR on File	45 mg/l 45 mg/l 400 col/100 ml 6.0-9.0 s.u.
July – September 2008	002	Chlorides, Daily Max pH, Daily Max	No DMR on File	Report 6.0-9.0 s.u.

## 8. EXISTING EFFLUENT LIMITS

### Outfall 001

Pollutant	Limitation		Reference
	Monthly Avg. (mg/l)	Weekly Avg (mg/l)	
Flow	---	Report	Previous permit; LAG530000
BOD <sub>5</sub>	---	45	Previous permit; LAG530000
TSS	---	45	Previous permit; LAG530000
Fecal Coliform	---	400 col/100 ml	Previous permit; LAG530000
pH	6.0 s.u. (min)	9.0 s.u. (max)	Previous permit; LAG530000

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### **Outfall 002**

Pollutant	Limitation		Reference
	Monthly Avg. (mg/l)	Daily Max (mg/l)	
Flow	Report	Report	LDEQ's guidance on stormwater; previous permit
Chlorides	---	Report	Previous permit; BPJ
pH	6.0 s.u. (min)	9.0 s.u. (max)	LDEQ's guidance on stormwater; previous permit

## **9. ENDANGERED SPECIES**

The receiving waterbody, Subsegment 120109 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

## **10. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

## **11. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

## **12. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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**Rationale for Sunbelt Chemicals Corp.**

1. **Outfall 001** - treated sanitary wastewater (estimated flow is 300 GPD)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	Previous permit; Similar Discharges; LAG530000
BOD <sub>5</sub>	30	45	Previous permit; Similar Discharges; LAG530000
TSS	30	45	Previous permit; Similar Discharges; LAG530000
Fecal Coliform (col/ 100 ml)	200	400	Previous permit; Similar Discharges; LAG530000
pH (s.u.)	6.0 (min)	9.0 (max)	Previous permit; Similar Discharges; LAG530000

**Treatment:** Extended aeration sewage treatment plant with chlorine contact

**Monitoring Frequency:** Semi-annually at the point of discharge from the sewage treatment plant

**Limits Justification:** Limits and monitoring frequencies are based on the previous permit, current guidance for similar discharges from other industrial facilities, and by utilizing the Class I Sanitary Discharge General Permit, LAG530000 effective November 1, 2007.

s.u. Standard Units

2. **Outfall 002** – Stormwater from the hydrochloric acid storage tank containment area

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	LDEQ's guidance on stormwater; previous permit
pH (s.u.)	6.0 (min)	9.0 (max)	LDEQ's guidance on stormwater; previous permit

**Treatment:** Caustic soda used to adjust pH

**Monitoring Frequency:** Quarterly at the point of discharge from the diked storage tank containment area

**Limits Justification:** pH and flow are based on the previous permit and LDEQ's guidance on stormwater. Because hydrochloric acid is the only commodity handled onsite, TOC and oil and grease, typical stormwater pollutants, are not expected to be present in the discharge. Therefore, monitoring requirements of TOC and oil and grease are not necessary.

s.u. Standard Units

**NOTE**

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls, since the flow is variable and estimated.

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### **STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT**

As per LAC 33:IX.2511.B.14.a-k, storm water discharges from facilities classified as SIC code 5169 are not considered to be associated with industrial activities. However a SWP3 is included in the permit since there is a potential for stormwater contamination from processing, including loading and unloading of hydrochloric acid, and because the discharge monitoring reports have shown that there are chlorides present in the stormwater discharges.

**For first time permit issuance**, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Part II of the permit).